## Robinson+Cole

E. EVANS WOHLFORTH, JR.

666 Third Avenue, 20<sup>th</sup> floor New York, NY 10017-4132 Main (212) 451-2900 Fax (212) 451-2999 ewohlforth@rc.com

Direct (212) 451-2954

Admitted in New York and New Jersey

July 7, 2023

## **VIA ECF**

Hon. Cathy L. Waldor, U.S.M.J. United States District Court District of New Jersey Martin Luther King Courthouse 50 Walnut Street Newark, New Jersey 017102

Re: <u>Johnson & Johnson Health Care Systems, Inc. v. Save On SP, LLC,</u> Civil Action No. 22-2632 (ES)(CLW)

## Your Honor:

As you are aware, this law firm in association with Selendy Gay Elsberg, P.L.L.C. represents defendant SaveOnSP, L.L.C. ("SaveOn"), in the above-referenced matter. I write to present SaveOn's request for an extension of time in which to file SaveOn's anticipated Motion to Seal the letter dated June 26, 2023 which appears now under temporary seal at ECF No. 123. Counsel for Plaintiff Johnson & Johnson Health Care Systems, Inc., have kindly consented to this relief.

There is pending before Your Honor a Motion by SaveOn to seal a document that appears at ECF No. 117. Your Honor previously granted an extension of time [ECF No. 126] to file subsequent motions to seal until two weeks following the Court's decision on sealing ECF No. 117. We ask respectfully that the Court grant a similar extension with respect to the motion to seal the June 26, 2023 Letter [ECF No. 123], making it also due two weeks after the Court rules on sealing ECF No. 117, and order that document ECF No. 123 remain under temporary seal pending further Order of the Court.

If the foregoing meets with the Court's approval, we ask that Your Honor endorse this letter as 'So-Ordered' and place it on the electronic docket of the Clerk of the Court. We thank Your Honor for your kind attention to this request. Please do not hesitate to have the Court's staff contact me with any questions or if we may be of any service whatsoever to the Court.

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Respectfully submitted,

/s/ E. Evans Wohlforth, Jr.

E. Evans Wohlforth, Jr.

cc: All Counsel of Record (via ECF)